Philip H. Gottfried Marc J. Jason Richard S. Mandaro Amster, Rothstein & Ebenstein LLP 90 Park Avenue New York, New York 10016 (212) 336-8000

Attorneys for Plaintiff Klauber Brothers, Inc.

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KLAUBER BROTHERS, INC.,

Plaintiff

Civ. Act. No. 15 CV 00874 (LLS)(AJP)

v.

AMERICLO COUTURE INC. d/b/a
I.C. LONDON and d/b/a ALISSA CAGGIANO;
JEFFERY LUO; and MICHAEL KIN SOON
LEONG

Defendants.

REQUEST FOR ENTRY OF DEFAULT

AGAINST DEFENDANT

MICHAEL KIN SOON LEONG

**ECF Case** 

To: Ruby J. Krajick Clerk of the Court

**United States District Court** 

for the Southern District of New York

Plaintiff Klauber Brothers, Inc. respectfully requests entry of default pursuant to Fed.R.Civ.P. 55(a) against Defendant, Michael Kin Soon Leong for his failure to plead or otherwise defend or respond to the Complaint within the time specified by the Federal Rules.

Within an accompanying Affidavit, the undersigned confirms that with respect to

Mr. Leong, the party against whom the Clerk is requested to enter default and against

whom judgment for affirmative relief is sought by the Complaint in the within action, it

is established as follows:

Michael Kin Soon Leong is not an infant or incompetent person; 1.

Michael Kin Soon Leong does not appear to be in the military 2.

service;

Michael Kin Soon Leong was properly served under Fed.R.Civ.P. 4, 3.

Proof Of Service having been filed with the Court; and

Michael Kin Soon Leong has failed to plead or otherwise defend in 4.

the action.

A proposed Certificate Of Default is submitted for the Court's convenience.

Respectfully submitted,

Philip H. Gottfried (pgottfried@arelaw.com)

Marc J. Jason (mjason@arelaw.com)

Richard S. Mandaro (rmandara@arelaw.com)

AMSTER, ROTHSTEIN & EBENSTEIN LLP

90 Park Avenue

New York, New York 10016

Telephone No.: (212) 336-8000

Attorneys for Plaintiff.

Klauber Brothers, Inc.

Dated: New York, New York

April 28, 2015

602778.1